

# Earth Station Application Processing Public Meeting July 22, 2005





# **Earth Station Application Timing: Receipt of Routine and Non-Routine Applications to Placement on PN**

Year Ending	Average Days
July 13, 2001	28
July 13, 2003	19
July 13, 2005	16





# **Earth Station Routine and Non-Routine Application Timing Distribution: Receipt to Placement on PN**

	Over the Past Year	Over the Past 6 Months
Within 1 Week	34.38 % (197)	34.33 % (92)
Within 2 Weeks	67.02 % (384)	74.25 % (199)
Within 3 Weeks	80.28 % (460)	86.19 % (231)
Within 4 Weeks	87.09 % (499)	93.28 % (250)
Within 5 Weeks	90.92 % (521)	96.64 % (259)
More than 5 Weeks	100.00% (573)	100.00% (268)





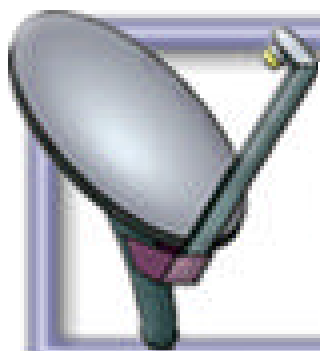
# Earth Station Applications

## Action Taken

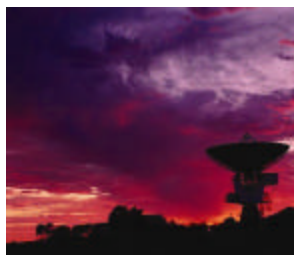
Period Ending	1 year Average Speed of Disposal*
July 13, 2001	78.61 days
July 13, 2003	52.69 days
July 13, 2005	40.45 days

\* Speed of Disposal: The average the number of days from filing to an Action. Includes all Actions Taken including Grants, Dismissals, & Denials





## Earth Station Application Processing Public Meeting





# **Four Common Issues leading to Earth Station Application Dismissals**

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## Good News:

- The Vast majority of applications are accepted for filing & processed expeditiously
- A Slim minority of applications are dismissed as defective
- Several common deviations from the rules emerged during our review of defective applications





# Common Issue #1: Technically Inconsistent Parameters

## Reminder:

- A. Maximum EIRP density per carrier must not be less than the computed Average EIRP Density per Carrier generated from other filed parameters
- B. Total EIRP for all carriers must be consistent with the Total EIRP computed from Total Input Power plus Transmit Antenna Gain

\* This Issue is the most commonly noted defect





# Common Issue #2: Not Identifying Specific Points of Communication

## Reminder:

- A. Earth Station Applications must identify specific satellites, including:
- All CSAT applications
  - All C-Band ESV applications (See ESV Order, FCC 04-286)
  - All non-FSS uses of Conventional -C or -Ku bands
  - All applications seeking to communicate with a foreign satellite not on the Permitted List
  - All applications seeking to use any band other than Conventional -C or -Ku bands
- B. ALSAT & PERMITTED LIST valid only for:
- 2-degree compliant fixed-satellite service earth stations **AND**
  - Conventional -C or -Ku bands

NOTE: Conventional C Band: 3700-4200 and 5925-6425 MHz bands  
Conventional Ku Band: 11.7-12.2 and 14.0-14.5 GHz bands





# **Common Issue #3:** **Complete Technical Information** **about a Foreign Satellite**

## **Reminder:**

Earth station applications seeking access a foreign satellite must include the same information required of space station applicants for a U.S. license (*See* Section 25.137(b))

- These applications (other than when using Permitted List Satellites in the Conventional –C or –Ku Bands) must include, or reference an FCC application having:
  - All the information specified in Section 25.114(d) such as
    - » link budgets
    - » two-degree spacing interference analysis
  - A Schedule S, as required by Section 25.114(a)





# **Common Issue #4:**

## **Failure to provide required information**

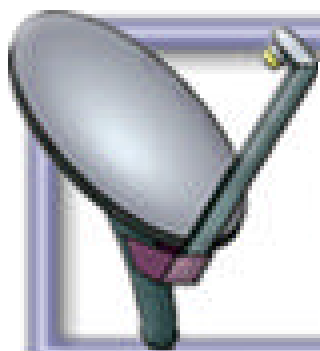
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### Reminder:

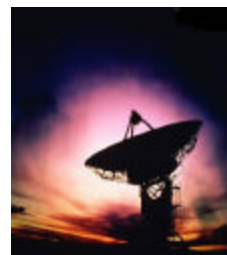
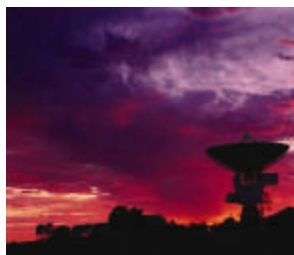
Applications must be complete & answer all the questions on Form 312

- A. 30/20 GHz band applications must include antenna radiation patterns as required in 25.138(d). Also see 25.115(e)
- B. New transmitting facilities/major modifications/major amendments must include Radiation Hazard Analysis
  - See Report No. DS-1492, released Feb 6, 1995, 10 FCC Rcd 2256 for certain exceptions
- C. Frequency Coordination and Interference Analysis Reports are required for frequency bands shared on a Co-primary basis with Terrestrial Radiocommunications Services
  - The coordination report filed with the 312 Application must be less than 6 months old





## Earth Station Application Processing Public Meeting





# **Earth Station Applications: Frequently Asked Questions**

**Andrea Kelly**  
**Chief, Policy Branch**  
**Satellite Division**  
**International Bureau**  
**202-418-7877**





# Why create an FAQ?

- Provide answers to Frequently Asked Questions on earth station application processing.
- Provide applicants with specific examples of common defects in applications and proposed solutions.
- Explain the substantially complete standard under which earth station applications are reviewed to be acceptable for filing.





# What is included in the FAQ?

- The focus of the FAQ is to provide practical and specific information.
- The FAQ covers a wide range of information – from the basic (e.g., links to Part 25 of the CFR) to some finer points (e.g., when an antenna radiation pattern must be filed with an earth station application to be acceptable for filing).





# SAMPLE FAQ

- **If an application does not substantially comply with the Commission rules, should a waiver request be included to ensure that the application will be accepted for filing and placed on public notice?**
  - Yes. Specifically, Section 25.112(b) of the Commission's rules provides that defective applications may be accepted for filing if:
    - The application is accompanied by a request which sets forth the reasons in support of a waiver of (or an exception to), in whole or in part, any specific rule, regulation, or requirement with which the application is in conflict.
  - The waiver request, however, must comply with Commission precedent requiring waivers to be plead with particularity.
    - Generic waiver requests (*i.e.*, non specific requests seeking waiver of all rules necessary) do not satisfy the pleading requirements.
    - Further, applicants should understand that even if the application is accepted for filing and placed on public notice, the Commission may ultimately deny the application or grant it with conditions requiring compliance with the rules.





# FAQ Status and Other Resources

## Currently Available on the Commission's Website

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- FAQ Status: Scheduled to be on the website within 2 weeks.
- Existing Resources:
  - The Commission's Space Station Permitted List – updated in 2004 in a user friendly format with more information about the foreign licensed satellites.  
<http://www.fcc.gov/ib/sd/se/permitted.html>.
  - Existing “Earth Station Licensing & Sample Form 312 Applications” webpage <http://ftp.fcc.gov/ib/sd/se/elichome.html#sec1>. The webpage contains links to:
    - International Bureau Filing System (IBFS) Licensing Database
    - Sample earth station applications
- Other Planned Additions to Earth Stations Webpage
  - Links to earth stations streamlining orders and other orders important to earth station applicants.

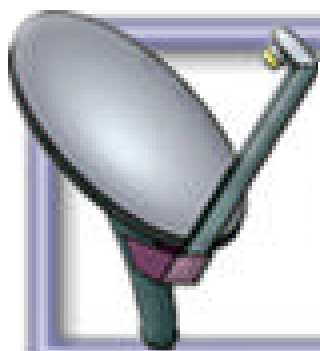




# Suggestions for the FAQ or Website

- If you have suggestions on additional information that should be included in the FAQ or available on the Commission's website, please email [ESprocessing.feedback@fcc.gov](mailto:ESprocessing.feedback@fcc.gov).





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# Filing Online with IBFS

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# IBFS

## **Current Status:**

- New My IBFS Interface (Launched October 2004)
- 312 EZ Form (Launched October 2004)
- 1<sup>st</sup> Generation E-Filing Forms (Other IBFS Filings)
- Schedule S Project
- Current Staffing
  - Kathleen Campbell, Contracting Officers Technical Representative (COTR)
  - Adrienne Downs, IBFS Support Specialist
  - Jackie Hutchinson, IBFS Program Manager
  - Thomas Sullivan, Assistant Bureau Chief





# **Continuous Evaluation and Improvement**

Based on your feedback we are continually working to improve IBFS

- Improving Usability
- Fixing Software Bugs
- Improving Helpdesk Support
- Planning for New Development





# Planned Improvements to IBFS

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- Streamlined Login (Summer 2005)
- Surrenders of Radio Licenses (Fall 2005)
- Construction Certificates (Fall 2005)
- Consummation of Assignments and Transfers (Late 2005)
- Improved Renewals (Spring 2006)
- Non-Docketed Comments and Petitions (FCC-wide initiative)





# We Want to Hear From You!

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- If you have IBFS questions or concerns you can e-mail us at:

[ibfshelp@fcc.gov](mailto:ibfshelp@fcc.gov)

- Or you can call us at the IBFS help line:  
202-418-2222

- To provide feedback about the Earth Station application process over the next few weeks, email us at:

[ESprocessing.feedback@fcc.gov](mailto:ESprocessing.feedback@fcc.gov)

